

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano

v.

The City of Nashua, et al.

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Civil Action No. 22-cv-00326-LM

**ASSENTED-TO MOTION TO EXTEND TIME TO ANSWER OR
OTHERWISE RESPOND TO NOVEMBER 23, 2022**

NOW COMES Defendant City of Nashua, and respectfully requests the time to respond to the Complaint be extended from November 18, 2022, to November 23, 2022. In support hereto, Defendant states as follows:

1. This case commenced on August 23, 2022, with the filing of a Complaint by Plaintiff.
2. Counsel represents Defendants Lombardi and Carrignan and has timely filed answers to the complaint on their behalf's. However, counsel requires an additional 5 days to complete a substantive answer on behalf of the City of Nashua due to the breadth of the complaint.
3. The requested extension will not impact any other deadlines as no other deadlines have been established.
4. No memorandum of law is filed in support of this motion as the relief requested is within the discretion of the Court.
5. Plaintiffs' counsel has kindly assented to the relief sought.

WHEREFORE, Defendant respectfully requests that this Court:

- A. Extend Defendant's deadline to answer to November 23, 2022; and
- B. Grant such further relief as justice requires.

Respectfully submitted,

CITY OF NASHUA

By its attorneys

CULLEN COLLIMORE SHIRLEY PLLC

Dated: November 18, 2022

By: /s/ Brian J.S. Cullen

Brian J. S. Cullen (Bar No. 11265)

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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: November 18, 2022

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen